

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION

UNITED STATES OF AMERICA)	
)	
v.)	1:06-CR-00170-WHA
)	
LINDA SCHALLER CANTELLI)	

DEFENDANT CANTELLI'S MOTION TO CONTINUE SENTENCING

Defendant Cantelli, through counsel, moves this Honorable Court to continue the sentencing of this matter set for April 17, 2007. As grounds for this Motion, Defendant says:

1. Defendant was initially scheduled to be sentenced on March 20, 2007. Defendant was ready at that time, but had not yet received a copy of the pre-sentence report. Defendant anticipates having several witnesses testify at the hearing in mitigation of her sentence. One of the witnesses is Reverend James Thrasher. Reverend Thrasher was available for testifying on March 20 as originally scheduled.

2. The Court rescheduled the sentencing for April 17, 2007. Reverend Thrasher is not available for testifying at that time. Reverend Thrasher leaves the country on April 16, and returns on April 20, 2007. Accordingly, if possible, Defendant requests this Honorable Court to schedule the sentencing either on or before April 15, or after April 20, 2007. Defendant requests this on the basis that Reverend Thrasher will give favorable mitigation testimony during the sentencing hearing. For the Court's scheduling purposes, Defendant also intends to call several other witnesses for testifying at the sentencing hearing. The testimony should take 15-30 minutes.

WHEREFORE, for good cause shown, Defendant moves this Honorable Court to continue her sentencing as requested herein.

_____ Respectfully submitted this the 23rd day of March, 2007.

s/ C. E. Vercelli, Jr.

CHARLES E. VERCELLI, JR. (VER003)

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CERTIFICATE OF SERVICE

I hereby certify that on March 23, 2007, I electronically filed the foregoing with the Clerk of the United States District Court for the Middle District of Alabama, using the CM/ECF system, which will send notification of such filing to the United States Attorney and to all counsel of record.

s/ C. E. Vercelli, Jr.

Of Counsel